

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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C.D., by and through her PARENTS and NEXT )  
FRIENDS, M.D. and P.D. and M.D. and P.D. for )  
themselves, )  
Plaintiffs, )  
v. ) ) Civ. Action No. 15-13617-FDS  
NATICK PUBLIC SCHOOL DISTRICT, )  
and BUREAU OF SPECIAL EDUCATION )  
APPEALS, )  
Defendants. )  
\_\_\_\_\_  
)

**ASSENTED-TO MOTION TO SEAL ADMINISTRATIVE RECORD**

Pursuant to Rule 5.3(B) and Rule 7.2 of the Local Rules of the United States District Court for the District of Massachusetts, defendant Massachusetts Bureau of Special Education Appeals (“BSEA”) respectfully moves to file under seal the administrative record, which contains information identifying the full first and last name of the student (referred to in the caption as “C.D.”), in order to protect the student’s privacy interests. Due to the voluminous nature of the administrative record (which consists of almost 5,000 pages) and given the burden that would result from redacting the administrative record, the BSEA requests that the Court allow the BSEA to file the entire administrative record under seal. In accordance with Local Rule 7.2, the BSEA will await the Court’s ruling on this motion, prior to filing the administrative record with the Court.

Pursuant to Rule 7.2, the BSEA further requests that the administrative record remain sealed until the conclusion of the case, at which time the parties will arrange to retrieve the administrative record from the Court.

Counsel for Plaintiffs and counsel for defendants Natick Public Schools have assented to this motion.

BUREAU OF SPECIAL EDUCATION  
APPEALS,

By its attorney,

MAURA HEALEY  
ATTORNEY GENERAL

/s/ Iraida J. Alvarez  
Iraida J. Alvarez, BBO # 647521  
Assistant Attorney General  
Government Bureau  
One Ashburton Place  
Boston, Massachusetts 02108  
(617) 963-2037

Dated: April 4, 2016

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)**

I certify that I conferred with counsel for Natick Public Schools and counsel for C.D. and her parents prior to the filing of this motion, and both counsel assented to this motion.

/s/ Iraida J. Alvarez  
Iraida J. Alvarez  
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that the above motion was filed through the Electronic Case Filing (ECF) system on April 4, 2016, and thus copies will be sent electronically to the registered participants as identified on the Court's Notice of Electronic Filing (NEF); paper copies will be served by first-class mail, postage pre-paid, to those indicated on the NEF as non-registered participants.

/s/ Iraida J. Álvarez  
Iraida J. Álvarez